

## TABLE OF CONTENTS

- 1.0 Introduction
- 2.0 Scoping Process
- 3.0 Price Field Office RMP Planning Schedule
- 4.0 Public Scoping Meetings
  - 4.1 Meeting Locations and Dates
  - 4.2 Attendance
  - 4.3 Number and Type of Comments Received
  - 4.4 Meeting Comment Summary and Excerpts
  - 4.5 Comment Summary by Meeting Location
- 5.0 Written Comments
  - 5.1 Method of Submittal
  - 5.2 Geographic Source of Unique Written Comments Received
  - 5.3 Geographic Source of Form Fax Comments Received
  - 5.4 Comments Summary
- 6.0 Issues Beyond the Scope of the RMP
  - 6.1 RS 2477
  - 6.2 Wilderness Designation
  - 6.3 Wild and Scenic River *Designation*
  - 6.4 Potential San Rafael National Monument Designation

### Scoping Meeting Comments

### Summarized Written Comments

### Appendices

- A Federal Register Publications
- B Public Notices and Press Releases
- C Planning Bulletin #1
- D Scoping Meeting Packet and Example Meeting Sign In Sheet

## 1.0 INTRODUCTION

The Bureau of Land Management (BLM) currently manages federal lands and mineral estate in the Price Field Office using the existing Price River Management Framework Plan (MFP) and the San Rafael Resource Management Plan (RMP). An update to these plans is needed to consolidate the plans into a single document and update information and guidance on new and changing resource uses. The Price Field Office RMP will replace the two existing management documents and provide management policy. Development of this RMP will take place over a two-year time frame with a completion target of December 2003.

In compliance with NEPA, public scoping was conducted to identify the issues necessary to develop a comprehensive RMP. This report describes the scoping process and provides summary information on the content and type of comments received. Section 2 of this report describes how scoping was conducted. Section 3 includes a schedule of events for the RMP process. Section 4 analyzes comments received at the public scoping meetings and Section 5 analyzes the written comments. Section 6 discusses the issues brought forth that are beyond the scope of this analysis.

## 2.0 SCOPING PROCESS

In November, 2001, with the publication of the Notice of Intent (NOI) to begin the planning process, The Bureau of Land Management Price Field Office initiated public scoping for issues pertaining to a new RMP. Scoping is the process required in the early stages of developing an Environmental Impact Statement (EIS) (FIGURE 2.1) to encourage public participation and solicit public input on the scope and significance of the proposed action (CEQ Regulations, 40 CFR 1501.7). Scoping helps identify issues important to the management of the area and assists in determining the extent of the analysis as well as specific issues to be examined in the planning process.

In accordance with the planning schedule (Section 3.0), scoping formally began with the publication of the NOI in the *Federal Register* on November 7, 2001, documenting BLM's intent to prepare a Resource Management Plan (Appendix A). Individuals and organizations were invited to submit comments in writing to the BLM. The notice also published a tentative schedule of public meetings where there would be additional opportunities to submit scoping comments. The *Federal Register* notice also described how the scoping meetings would be publicized in local areas before the meetings were to take place.

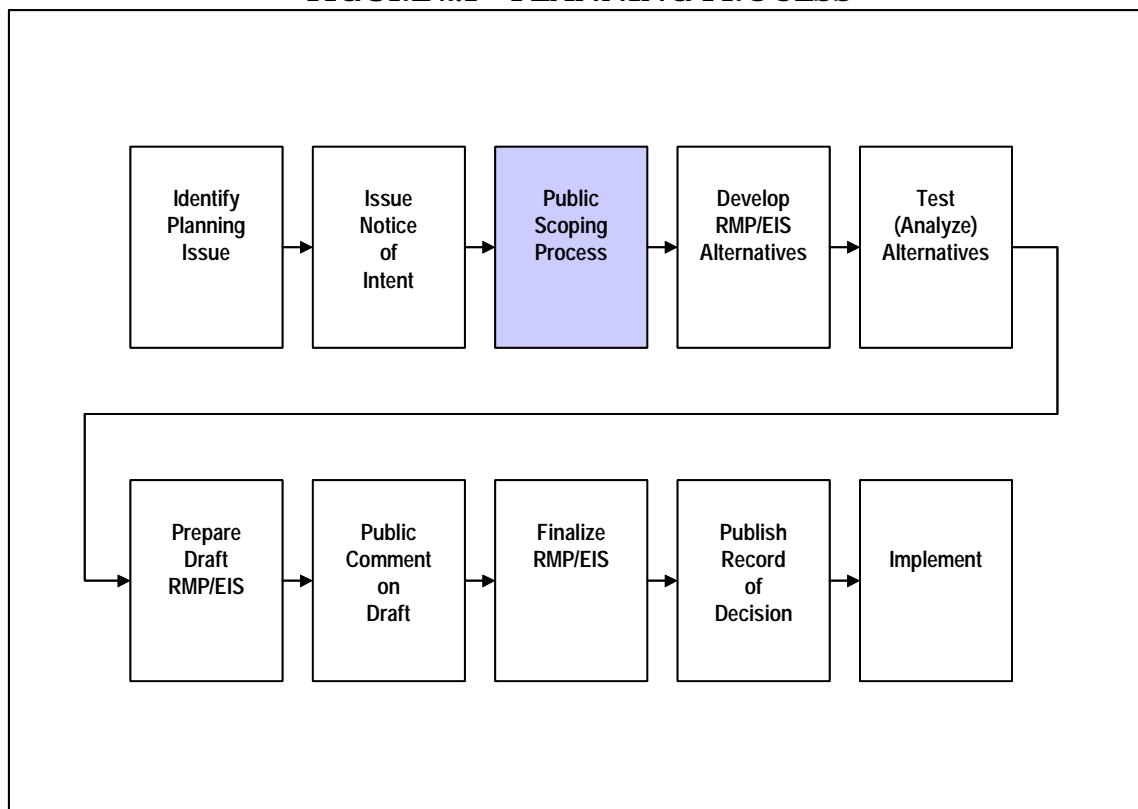
Following the *Federal Register* publication on November 7, 2001 a number of comments were received indicating that the scoping period was too short and the geographic extent of the meeting sites was too limited. These comments were considered and a decision was made to expand the scoping meetings and extend the scoping period. The NOI (Appendix A) noted that meetings were planned for Price, Castle Dale, and Green

River. Additional meetings in Salt Lake City, Moab, UT and Grand Junction, CO were added to the schedule. The comment deadline was then to February 1, 2002. Notice of this extension and the additional meetings was published in the *Federal Register* on January 18, 2002 (Appendix A).

Public notice of the scoping meetings was published in *Price Sun Advocate* and *Emery County Progress*, the local papers in Carbon and Emery County in addition to *The Salt Lake Tribune* and *Deseret News*. Additional press releases noting meeting dates, times, in addition to explanation of the planning process were sent to statewide and local newspapers, and local area radio and television stations (Appendix B).

The six public meetings were held during the last three weeks of January 2002 (Section 4.1). Written comments were received throughout the comment period. Both written comments and those received at scoping meetings are in the public record. These comments, and summaries of these comments comprise this scoping report.

**FIGURE 2.1 – PLANNING PROCESS**

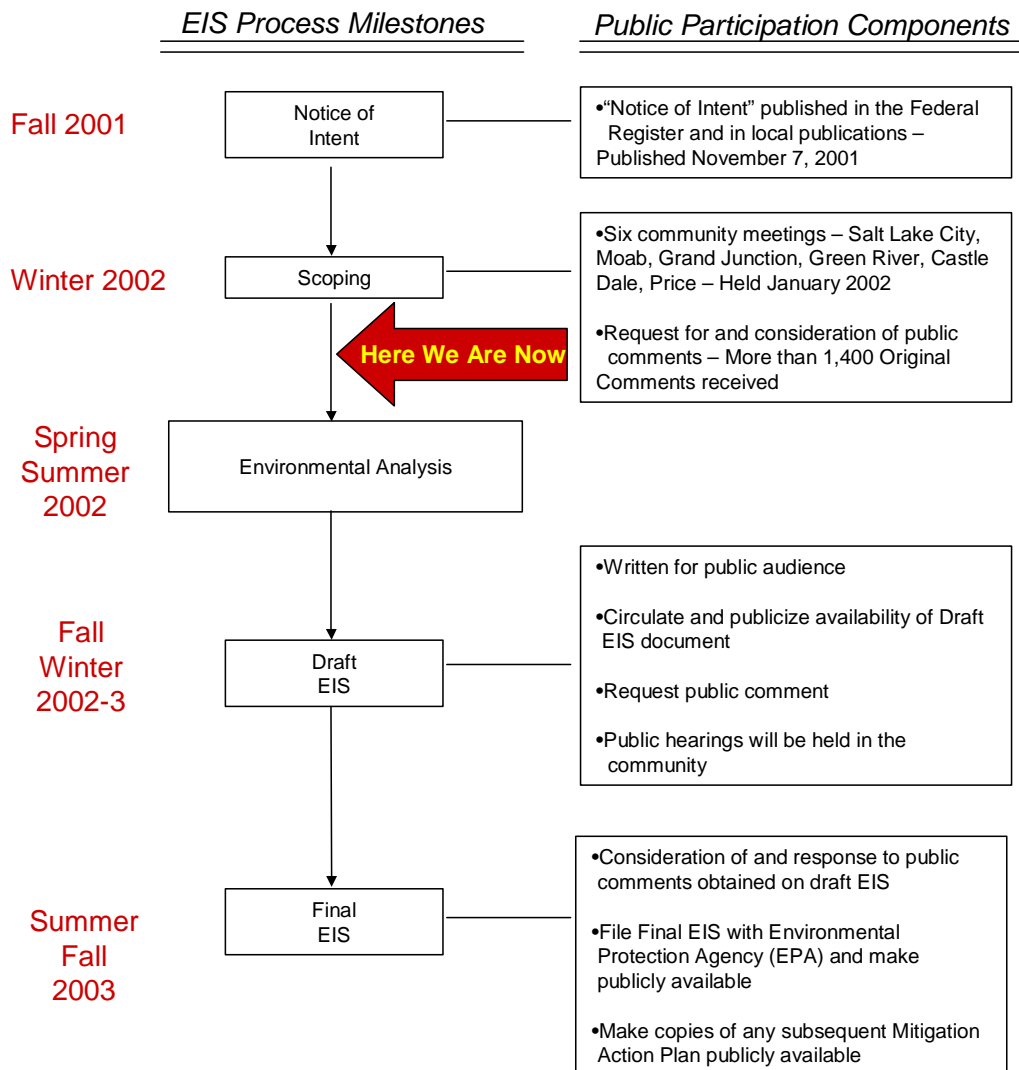


### 3.0 PRICE FIELD OFFICE RMP PLANNING SCHEDULE

**TABLE 3.1**  
**Planning Schedule**



#### Price RMP/EIS Process and Public Participation Components



## 4.0 PUBLIC SCOPING MEETINGS

### 4.1 Meeting Locations and Dates

**TABLE 4.1**  
**Meeting Locations**

<b>Location</b>	<b>Date</b>	<b>Location</b>	<b>Date</b>
Salt Lake City, UT	January 15, 2002	Green River, UT	January 29, 2002
Moab, UT	January 16, 2002	Castle Dale, UT	January 30, 2002
Grand Junction, CO	January 17, 2002	Price, UT	January 31, 2002

### 4.2 Attendance

Total registered attendance for all six meetings was 270 people. The large numbers of participants in communities closest to the planning area indicated a great deal of local interest in the planning process. Based on attendance figures and comments received, publicity for the meetings, as discussed above, was adequate and went well beyond the legal requirement.

**TABLE 4.2**  
**Meeting Attendance**

<b>Location</b>	<b>Attendance</b>
Salt Lake City, UT	59
Moab, UT	12
Grand Junction, CO	21
Green River, UT	55
Castle Dale, UT	48
Price, UT	75

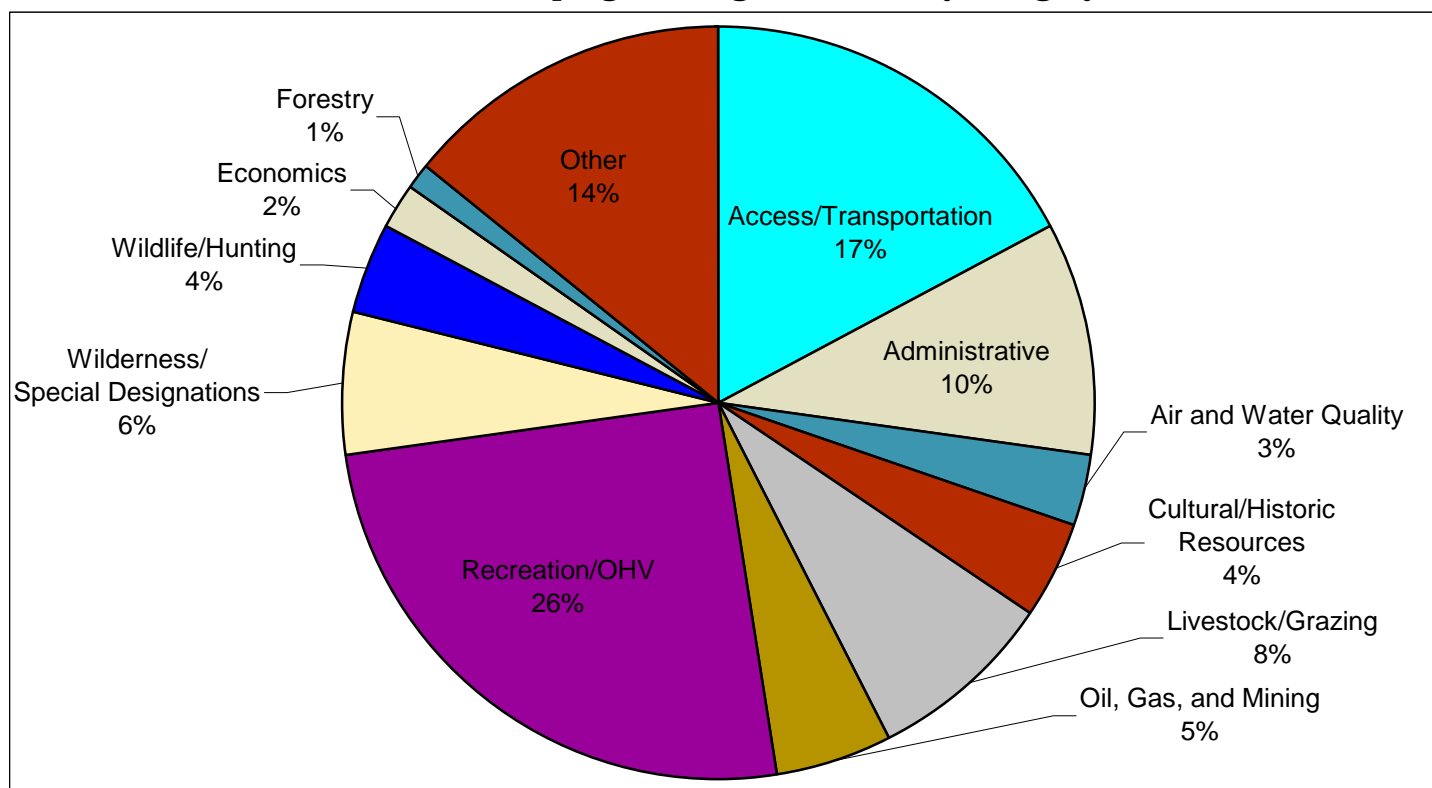
### 4.3 Number and Type of Comments Received

The number of individual comments received from the six meetings is 698. Individual comments were categorized by primary topic and the totals are shown in Table 4.3 by category. A wide range of comments was recorded, with some types of comments heard more frequently than others. A number of comments address more than one category, but were classified by their major theme for ease of understanding. Comments classified as 'Other' generally discussed long-term preservation desires, multiple use, or other very specific issues. Listed in Table 4.3 is a summation of these comments. The table shows the topic discussed in an issue-neutral perspective. It is not intended to show bias on any issue, but to indicate the relative level of interest in that issue.

**TABLE 4.3**  
**Comment Categories**

<b>Comment Category</b>	<b>Number Received</b>
Access/Transportation	120
Administrative	67
Air and Water Quality	18
Cultural/Historic Resources	31
Livestock/Grazing	57
Oil, Gas, and Mining	32
Recreation/OHV	173
Wilderness/Special Designations	45
Wildlife/Hunting	31
Economics	15
Forestry	7
Other	102

**FIGURE 4.1**  
**Price RMP Scoping Meeting Comments by Category**



#### 4.4 Meeting Comment Summary and Excerpts

Each of the meetings raised unique issues and concerns, but there were some common elements to many of the comments received. The number of ideas and concerns related to motorized access and OHV use were the most frequently heard topics. Individuals at each of the meetings expressed serious concern over OHV management. In general, comments received on OHV use expressed the sentiment that maintaining motorized access to the planning area was preferred to limiting travel. Some comments, however, did acknowledge the possible benefits from partially limited travel. Various OHV comments addressed access. Many meeting participants had serious concerns over the possibility that access to area resources could be limited by this planning effort. A large number of comments from the Administrative and Other categories addressed perceived problems with BLM organization, management, processes and strategies.

There were a variety of comments on other topics, including:

- The desire for economic impacts on the local communities to be analyzed
- Concern regarding timber resource development
- Potential impacts on cultural resources
- Stabilization of grazing permits and the protection of grazing rights
- Promotion of responsible exploration and development of oil and gas resources
- Desire for the completion of the wilderness designation process; and
- Concern that habitat assessment decisions made with input from the Division of Wildlife Resources.

There were many individual comments recorded, but the majority of the comments received at the meetings fell into the following categories:

- The RMP needs to address access and transportation issues in a manner that will satisfy both the need for access to the area and its resources as well as devising a careful strategy to protect the area, its resources, and the ecosystem from destructive uses.
- The planning process should include careful attention to air and water issues including water supplies, air and water quality, and impacts to water allocation with increasing use of the area.
- Rangeland health and grazing allotments need to be examined in the plan and a strategy for maintaining public lands ranching should be included.
- Mineral development strategies should also be included in the RMP, with specific mechanisms for resource protection and restoration included in these plans.
- OHV use needs to be carefully examined and planned for with the coordinated involvement of local communities.

- Increasing amounts of all types of recreation uses need to be planned for and adequate facilities, information, and a wide spectrum of opportunities needs to be provided.
- The RMP also needs to address wilderness study areas and other special designations such as Wild and Scenic Rivers and Areas of Critical Environmental Concern.
- Impacts to wildlife populations from other uses need to be analyzed and wildlife habitat management should to be coordinated with Utah Department of Natural Resources.

Overall, the scoping meetings elicited a wide range of input from a diverse cross-section of the public. The comments received were added to e written comments to complete the collection of public input.



#### 4.5 Comment Summary by Meeting Location

##### **Salt Lake City 1/15/02**

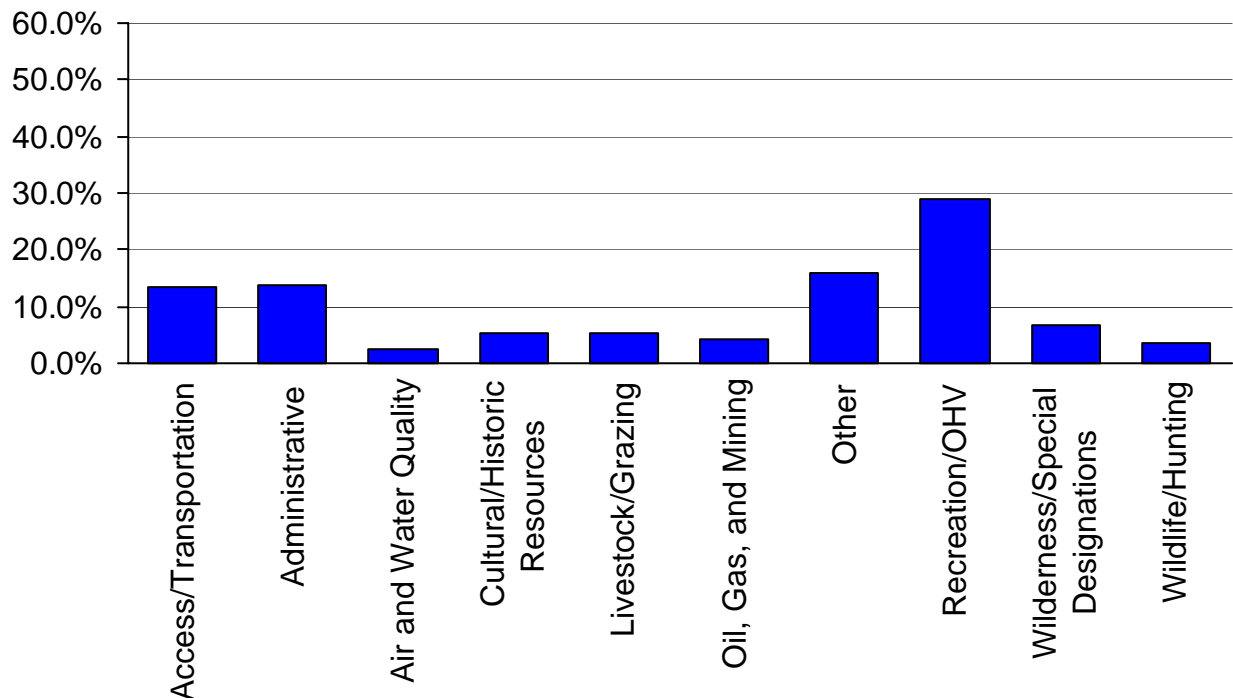
Comments received at the Salt Lake City scoping meeting covered many of the same issues raised at other sites. The overall theme of Salt Lake City did differ in some respects, focusing more heavily on recreation issues. Overall, the comments received in Salt Lake City were not clearly more preservation oriented than those received at any of the other locations, but did mention a wider variety of issues. Many of the comments identified not only issues of concern, but went further to suggest management actions or ask for explanation/justification of current policies.

Some of the comments received at Salt Lake City covered:

- Concerns about air and water quality
- Emphasis on cultural resource protection
- Several requests for improved recreation maps
- Concern about grazing impacts
- Desire for increased mineral restrictions
- Support for WSA's

**FIGURE 4.2**

### **Salt Lake City Comments**

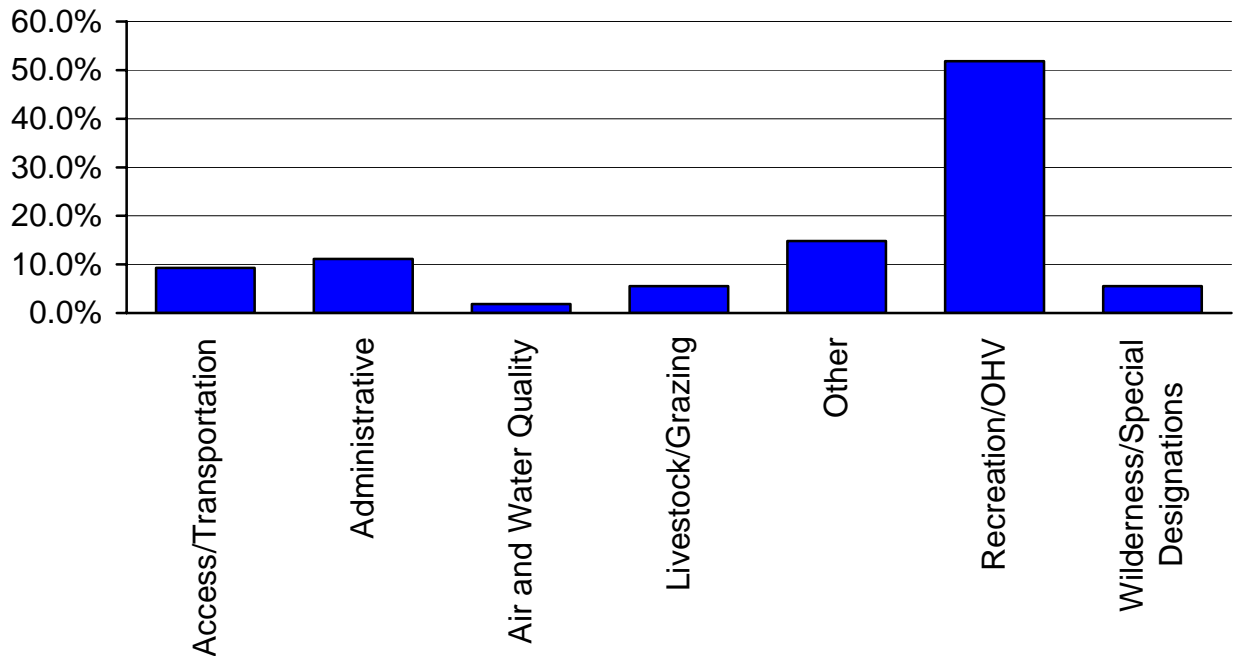


**Moab 1/16/02**

The Moab meeting was small with an opportunity for in-depth discussion of individual comments and suggestions. This meeting had heavy emphasis on recreation as many of the participants were actively involved in various forms of recreation resource use. Other issues were often discussed in the context of recreation. Parts of the discussion mentioned the need for a clear transportation plan, possibly the use of recreation zoning as in Moab, and concern for continued grazing and wilderness presence in the planning area. Issues raised at other scoping meeting but not mentioned specifically at this meeting included oil and gas, cultural resources, economics, and wildlife/range issues.

**FIGURE 4.3**

**Moab Comments**



Issues from Moab include:

- Possibility of recreation zoning system
- Trail system information and education needs
- Need to improve hands on recreation mgmt.
- Need to use planning models from other areas

### Grand Junction 1/17/02

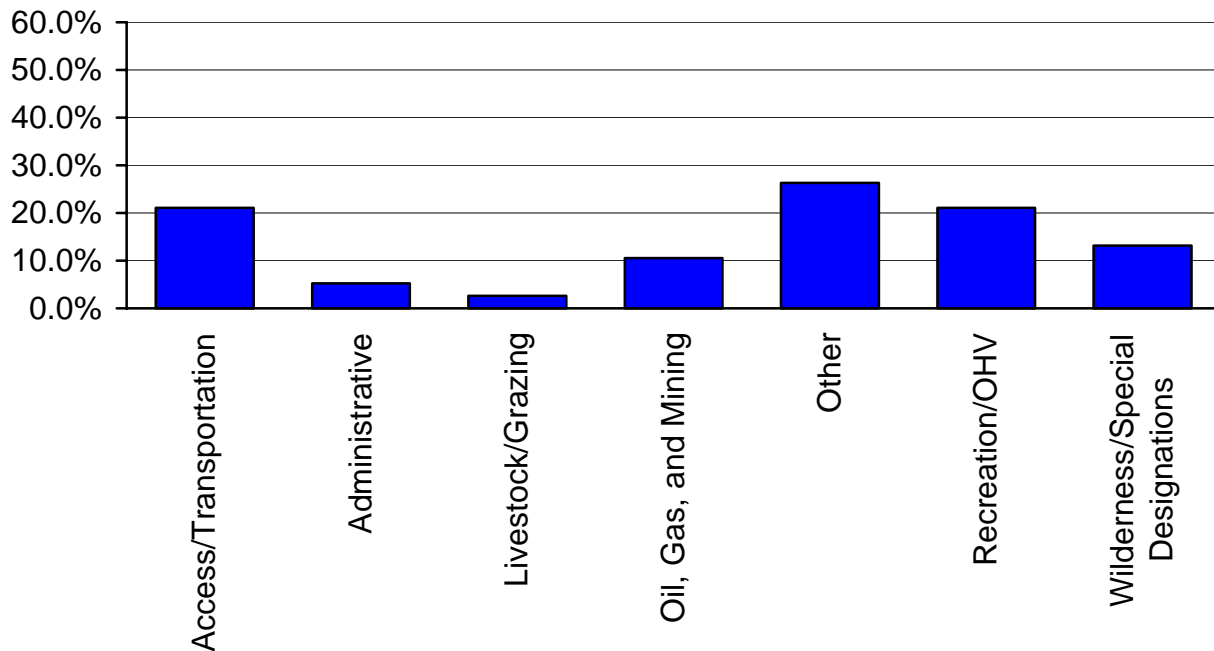
The Grand Junction meeting was a relatively small meeting with some opportunity for discussion of the issues. Issues discussed focused heavily on access, oil and gas, and a focus on how the RMP will impact area social conditions. Attendees voiced support for the oil and gas development and the access needed to support it. OHV use was also heavily discussed with an overriding tone of support for as much OHV access as possible.

Issues from Grand Junction include:

- Maintain the existing roads and ROW's
- Promote responsible oil and gas development
- Emphasize multiple use
- Examine social impacts of the RMP

**FIGURE 4.4**

### Grand Junction Comments

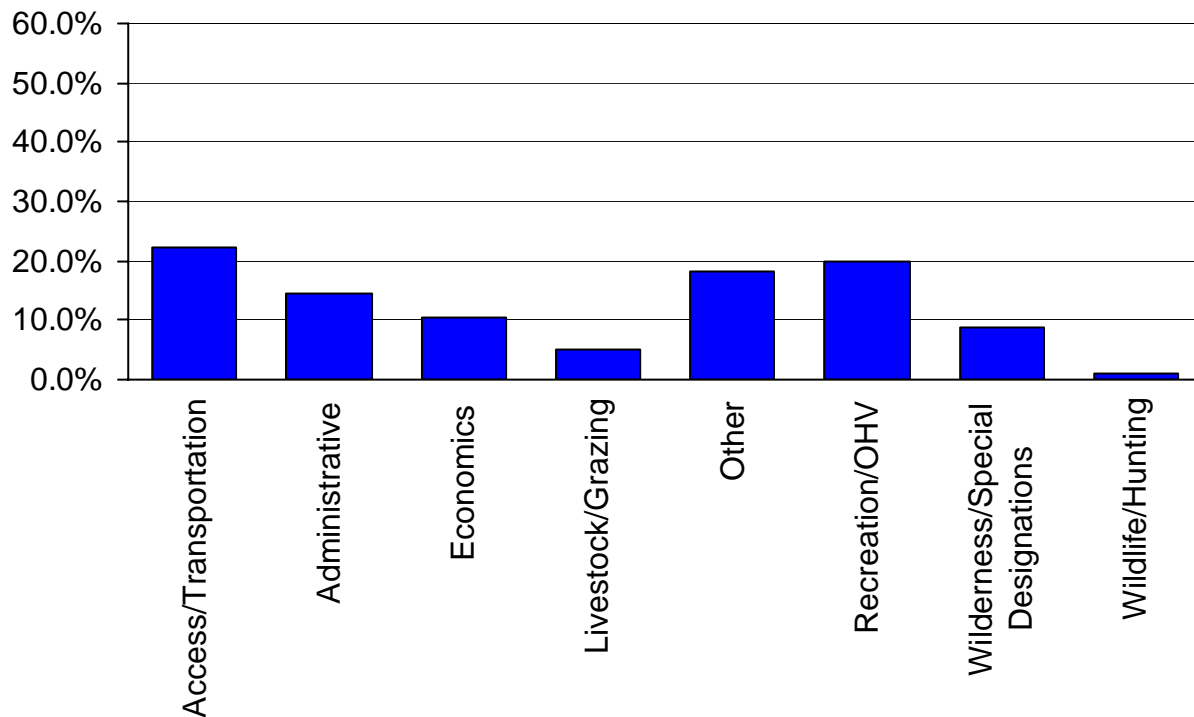


### **Green River 1/29/02**

The Green River meeting was highlighted by Emery County's announcement of its intent to submit a plan for a San Rafael National Monument to the governor. Attendance was high at this meeting and a large number of comments and concerns were initially directed at this issue. The comments received that were within the scope of this RMP were heavily focused on access to the planning area and the use of OHV's. Discussion also focused on the economic impacts of this RMP and other planning efforts with emphasis on the need to have Green River benefit from increased use of the area.

**FIGURE 4.5**

### **Green River Comments**



Issues from Green River include:

- Need to maintain access on all existing routes
- Maintain grazing as a resource use
- Find ways to benefit Green River economically
- Allow OHV use as much as possible

**Castle Dale 1/30/02**

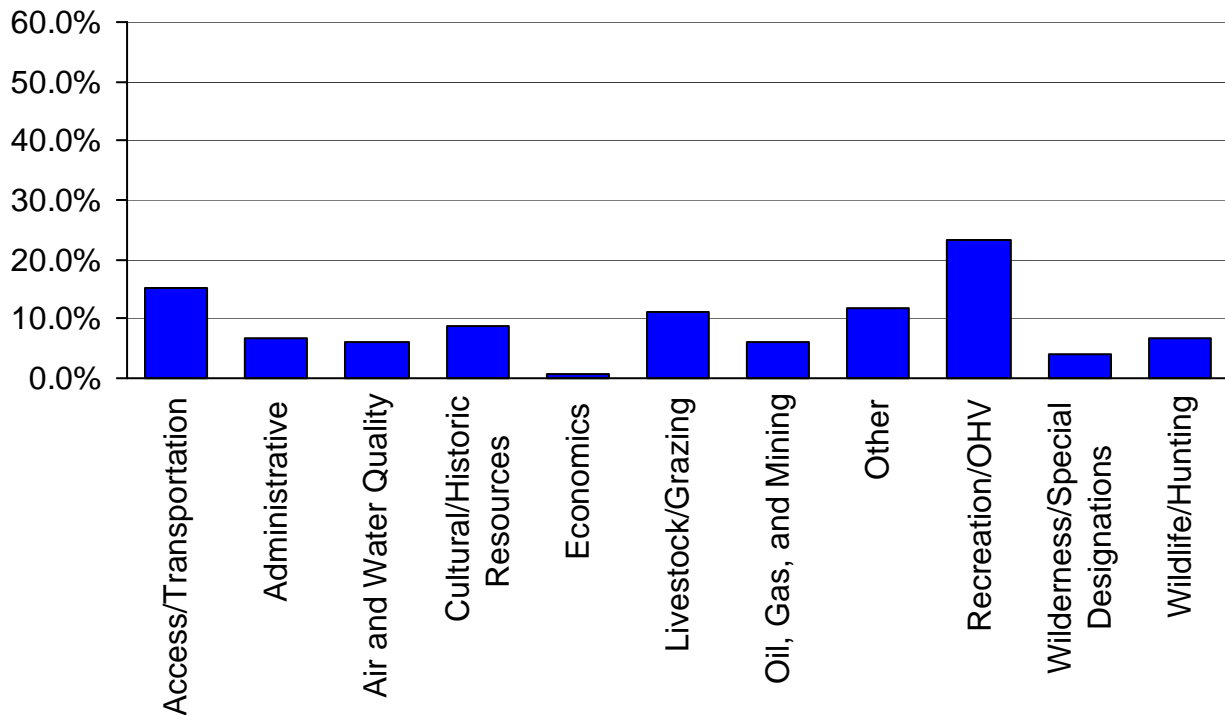
Castle Dale's meeting was well attended and a wide variety of issues were discussed. Individuals were concerned with the potential National Monument and came to ask questions and make comments on that issue. After a brief explanation of how the planning processes would be separate, many comments were received on this planning RMP. The emphasis tended towards issues related to access and OHV recreation, but grazing and cultural resources were also highlighted. There were specific requests that the RMP protect cultural and paleontological resources while allowing appropriate access and education. Grazing comments were focused on allowing the current level of livestock use with emphasis on range health maintenance.

Issues from Castle Dale include:

- Maintain motorized access
- Protect and enhance cultural resource uses
- Manage wildlife and wild horse grazing
- Maintain backcountry airstrips

**FIGURE 4.6**

**Castle Dale Comments**

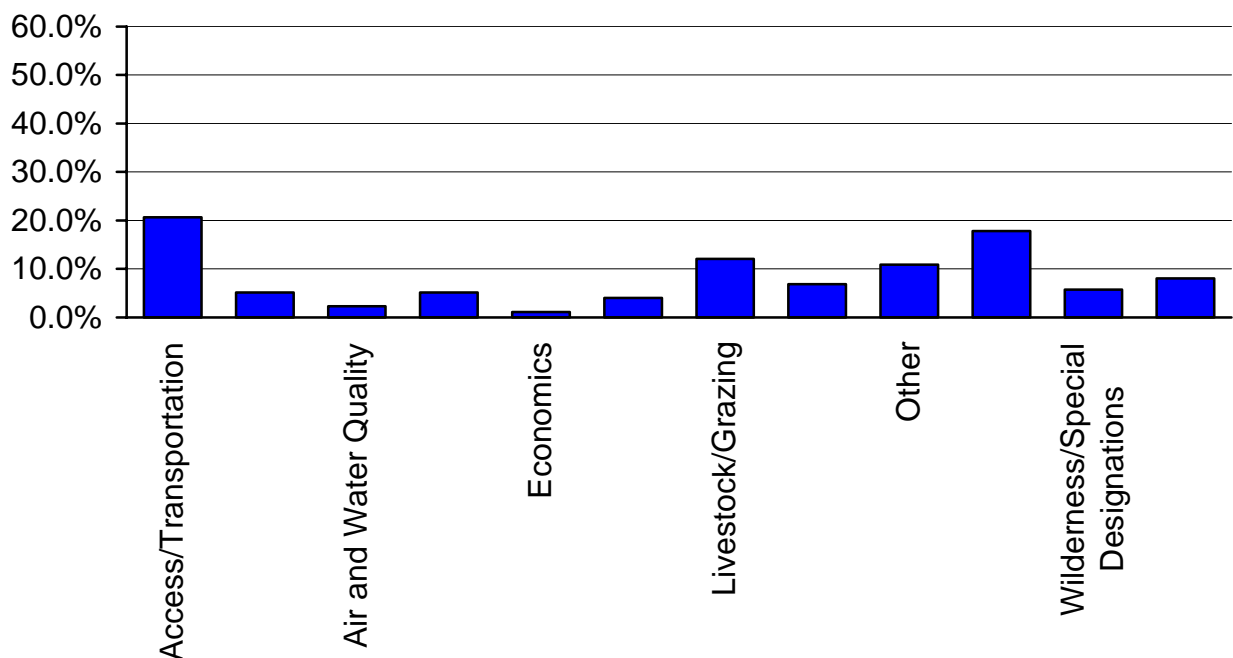


### Price 1/31/02

In Price, the comments followed a similar pattern with access and recreation the most frequently mentioned topics. Like Salt Lake City and Castle Dale, the comments in Price covered a wide range of issues. Grazing and associated range issues were heavily discussed and tended to support continued use of the area for grazing. Many of these comments requested that the RMP identify strategies for improving range health without reducing livestock grazing or impacting wildlife. An issue mentioned in Price that was not discussed in any other location was the need for more active forest management. Comments on forestry asked that the RMP develop comprehensive forest plans that include fire as a management tool. The comments also identified the potential for timber harvest in the planning area.

**FIGURE 4.7**

### Price Comments



Issues from Price include:

- Allow and clarify access to all areas possible
- The RMP should examine timber resources
- Maintain the ranching lifestyle
- Identify impacts of recreation to other uses

## **5.0 WRITTEN COMMENTS**

Written comments were also solicited in the scoping process. 10,700 letters were received via mail, fax, and e-mail. These letters contained over 1,100 unique comments for consideration in the planning process. The comments identified 12 issues that require consideration in the RMP as shown in Figure 5.1. Similar to the issues identified at the public meetings, these issue categories included: access and transportation, administrative, air and water quality, cultural/historic resources, livestock and grazing, oil, gas, and mining, recreation/OHV, wilderness/special designations, wildlife and hunting, economics, forestry and a category for other unique issues.

### **5.1 Method of Submittal**

#### **Comments Submitted by Mail**

Individuals and organizations took the time to submit written comments by mail detailing the issues they felt were important to the scoping process. 1,060 different comments were received by mail from approximately 550 commentors. These comments identified issues in every category listed above for consideration in the RMP process. Numbers of comments received by mail in each category are shown in Table 5.1.

#### **Comments Submitted by Fax**

Many individuals contributed comments by fax. Of nearly 10,000 faxes received, some 9,800 were form letter faxes submitted by individuals through one organization. This organization allowed their members to contribute their thoughts in a single form letter that identified wilderness management issues to be considered in the RMP. These issues included how other resource uses, such as mineral development and range management, affected wilderness resources. Other individuals shared their opinions in unique letters received by fax. Numbers of unique comments received by fax in each category are shown in Table 5.1.

#### **Comments Submitted by E-mail**

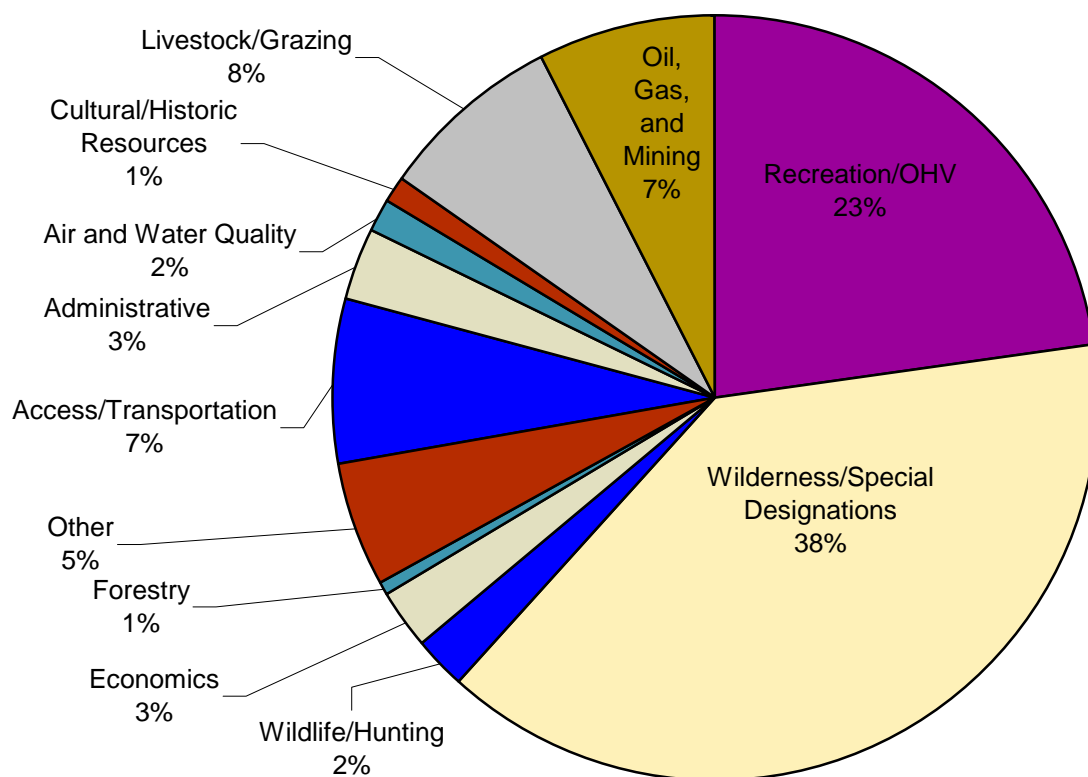
Almost 20 individuals took advantage of the Internet to submit their comments on the Price RMP and e-mailed their letters. Numbers of comments received by e-mail in each category are shown in Table 5.1.

**Table 5.1**  
**Unique Comments by Method Received**

<b>Comment Type</b>	<b>Comment Category</b>	<b>Number of Comment Received</b>
<i>Unique E-mail comment</i>		
	Access/Transportation	1
	Administrative	1
	Economics	3
	Oil, Gas, and Mining	1
	Other	1
	Recreation/OHV	5
	Wilderness/Special	5
<i>Unique Fax In Comment</i>		
	Access/Transportation	14
	Administrative	5
	Air and Water Quality	1
	Cultural/Historic Resources	1
	Economics	3
	Forestry	2
	Livestock/Grazing	2
	Oil, Gas, and Mining	21
	Other	13
	Recreation/OHV	13
	Wilderness/Special	132
	Wildlife/Hunting	3
<i>Unique Mail In Comment</i>		
	Access/Transportation	58
	Administrative	26
	Air and Water Quality	16
	Cultural/Historic Resources	8
	Economics	21
	Forestry	4
	Livestock/Grazing	82
	Oil, Gas, and Mining	56
	Other	41
	Recreation/OHV	225
	Wilderness/Special	275
	Wildlife/Hunting	19
<i>Phone Call</i>		
	Other	1



**FIGURE 5.1**  
**Price RMP Unique Scoping Letter Comments by Category**

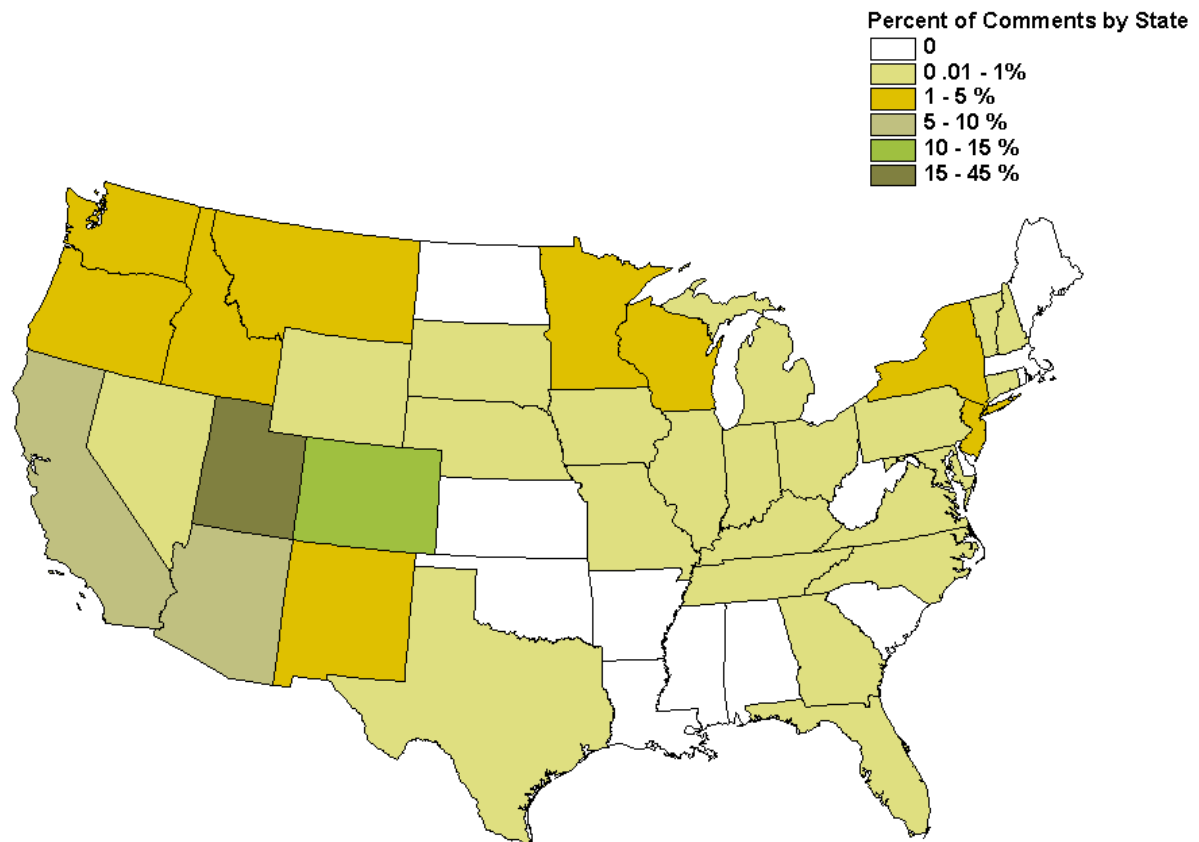


## 5.2 Geographic Source of Unique Comments Received by Mail, Fax and E-mail

Comments were received by mail from across the country, but were most often received from states closest to the planning area. Utah generated the greatest percent of the mailed in comments with 45% and Colorado was next with 13%.

**FIGURE 5.2**

### Geographic Source of Unique Comments



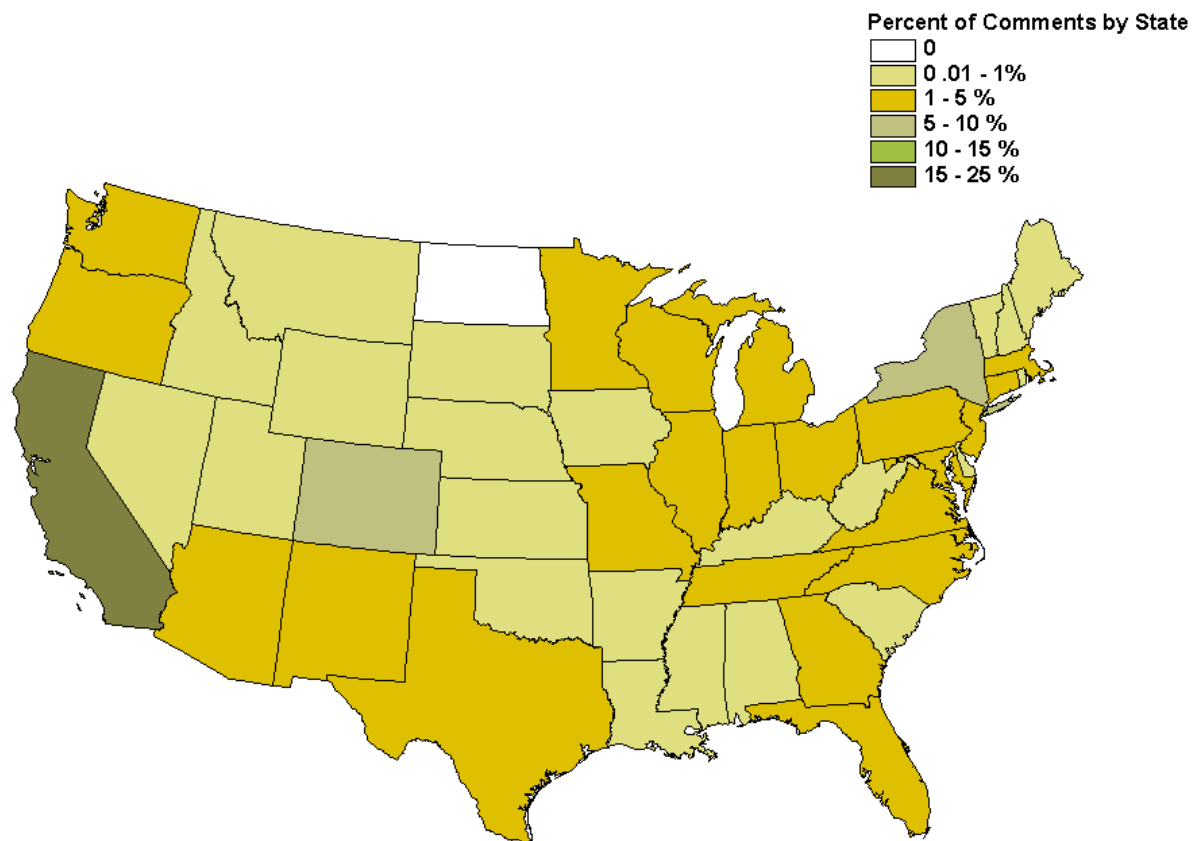
*\* Less than 1 % of the unique comments were also received from the following areas: Alaska, Hawaii, Scotland, and Bolivia.*

### 5.3 Geographic Source of Form Fax Comments

Form fax comments were received from across the country, but most were received from outside the state of Utah and the mountain west region. California generated the most for fax comments with 20% of the faxes. New York and Colorado followed next with 8% and 5% respectively.

**FIGURE 5.3**

## Geographic Source of Form Fax Comments



*\* Less than 1 % of the form fax comments were also received from the following areas: Alaska, Hawaii, Australia, Austria, Barbados, Belgium, Brazil, Canada, China, Croatia, Denmark, England, Finland, France, Germany, Greece, Holland, Italy, Japan, Malta, Mexico, Netherlands, Norway, Puerto Rico, Scotland, Singapore, Spain, Switzerland, and the Virgin Islands.*

## 5.4 Comments Summary

### **Access/Transportation Comments**

A large number of comments dealt with how access to the resource area is managed. Access was defined in the comments received as including roads, trails, and rights-of-way. Many letters discussed the concept of a network of roads and trails as part of the issue of access to public lands. Access was discussed as a component of nearly every other resource use. Comments stated repeatedly that nearly all activities depended on maintaining access to the resource area. Many of the comments received explained that a system of road and trail designations might be necessary in order to effectively manage resource area transportation.

Perhaps the most frequently discussed item in letters dealing with access was motorized transportation. Writers consistently described the need to maintain the existing level of motorized road access. Some individuals and organizations felt that additional access was needed in the resource area, while others felt that roads and trails were too pervasive and needed to be limited.

One reason mentioned for keeping roads and trails open to motorized access included the need for equal access to the resource for people of all ages and abilities. This idea was brought forth frequently as a clear justification of maintaining and/or expanding the transportation network. Another reason used to support motorized recreation access was as a method of access for dispersed camping. Many letters addressed the importance of dispersed camping and the need for road access in order to maintain this recreation opportunity.

Some opinions disagreed with the open access point of view and called for additional restrictions to motorized access in the resource area. Comments received indicated that resource damage was being caused by road access to the resource area and needed to be slowed using road closures and restrictions. Writers suggested that an ample or even overabundant amount of road access existed in the resource area and that closures would not significantly affect access to the resource.

Another common theme in the comments was the need for improved trail inventories, mapping, and signage. Many letters requested that the BLM develop a transportation plan that included a thorough inventory of all routes in the resource area. This inventory could then be published in map form for the public to review. Regardless of the type of designations assigned to various routes many people felt that a comprehensive system of signs needs to be installed in order to clarify where travel is appropriate. Many letters described

how resource damage is directly caused by a lack of clear information on the status of roads. Clear signage was the solution most widely proposed to address this problem.

A number of comments addressed the effects that the designation of a wilderness study area (WSA) or Area of Critical Environmental Concern (ACEC) could have on the transportation network. Some comments suggested that there should be no new designations, while others proposed that roads should be eliminated from existing and future WSA's and ACEC's. The basic difference in the discussion on roads in special designation areas concerned the amount of impact to other resources. Those in favor of road access argued that roads caused few or no impacts to other resources. Some suggested that roads were necessary in order to properly manage these areas. Those opposed to roads in special designation areas argued that roads lead to increased resource damage from exotic species invasion, increased erosion, increased air pollution, and habitat fragmentation.

Another issue mentioned in several comments was that of backcountry airstrip access. Individuals mentioned backcountry airstrips as a unique and valuable recreation and transportation resource. Specific requests were made that these airstrips be considered in the planning effort and that the airstrips be left open. Users of the airstrips state that they have limited impacts to other resources because they require little maintenance, occupy only a small land area, and have only a few users. Many of the comments suggested that the airstrips could be maintained by volunteer groups to avoid additional work for the BLM.

### **Administrative Comments**

Many of the comments received addressed ways in which the BLM might improve some of the practices it uses in the administration of the RMP process. Others discussed ways in which the BLM might improve general agency management, improve interagency cooperation, or work with other organizations. Comments of this nature were categorized as administrative.

Several comments discussed the public involvement process being used by BLM in the planning process. Some letters dealt with which opinions should be included in the planning process. Some felt that only local input should have significant weight in the process, while others argued that opinions should be sought from a nationwide audience. Nearly all of this type of comment asked for better dissemination of information. A large number of commentators expressed their desire to be more involved with the planning effort as it progressed.

One of the specific administrative issues mentioned in several comments was cooperation with adjacent landowners. These comments suggested that the BLM

make efforts to improve relationships with both private and public landholders in order to improve overall management of the area. Closely tied to this discussion were comments addressing the need for the BLM to improve its relationships with all local area stakeholders including local governments, non-governmental organizations, interest groups, and private citizens.

Other administrative comments received discussed issues such as budget constraints, staff limitations, land exchanges, and other planning efforts. Authors expressed the need for BLM to evaluate the reality of their plans using budget and manpower estimates. Some comments asked that land exchanges be sought only when they supported resource conservation. Several comments highlighted the need for this planning process to consider other plans under way in adjacent resource areas to ensure consistent policies.

### **Air and Water Quality**

Air and water quality were mentioned in comments both as part of other issues and as a separate resource management issue. Comments mentioned air and water quality as components of range management, mineral development, transportation management, interagency cooperation, recreation management, and special management designations. The comments received made it clear that air and water quality were a key concern of many individuals and organizations.

One of the primary items discussed in the comments was concern over the amount of dust produced by roads in the resource area. Both individuals and organizations expressed interest in determining the impacts to air quality from roads and then managing road surfaces and traffic volume to minimize the impacts. Several comments indicated a need for improved monitoring and modeling of air quality in the resource area and region in order to assure that standards are actually being met. Comments stated that the impacts to air quality in nearby national parks caused by activities in the Price Resource area need to be examined. The impacts to cultural resources in the area caused by degraded air quality were also mentioned as a concern.

Water quality was frequently discussed. Comments pointed out that certain management actions such as water developments, grazing, and ORV recreation were having significant impacts to riparian ecosystems and water quality. These comments expressed a desire to see improved inventory and monitoring of riparian systems and associated water quality. The comments stated that management needs to preclude any activity that has negative impacts to water quality and that enforcement of this policy needs to be improved. The need for comprehensive water quality and quantity standards that go beyond numeric measures was also mentioned.

Some comments were of the position that air and water quality were not being negatively impacted by resource uses in the area. These comments stated that air and water quality might actually be improving and that activities permitted in the past should be allowed to continue. Specific activities mentioned in relation to water quality included water development, mining, roads, and grazing. Many of these comments stated that the impacts to water quality from these resource uses were minimal and easily managed. Comments of this type explained that impacts could be kept to a minimum and later reclaimed in exchange for benefits from the various resource uses.

### **Cultural/Historic Resources**

Cultural and historic resources were frequently mentioned. In general, all comments expressed the idea that cultural and historic resources needed broader protections from the impacts being caused by other resource uses. Some of the resource issues identified as harmful to cultural and historic resources were recreation, minerals development, OHV usage, impacts due to air pollution and grazing. Some of the comments on cultural and historic resources called for better attention to regulations governing these sites and a need to establish agency and non-profit partnerships for resource protection.

### **Economics**

Comments received on the economics of the resource management plan indicated a need for more in-depth analysis of the impacts of resource management decisions. Comments indicated that there are costs and benefits to many resource uses that the BLM is failing to acknowledge in its decision making process. The predominant theme in nearly all economics comments was a desire for a full accounting of all costs and benefits of all uses and management actions.

Many comments expressed a desire for maintaining or expanding the local economies by allowing the most economically beneficial resource uses to occur. Some of the resource uses that were specifically mentioned as having economic benefits included mineral development, grazing, and tourism. OHV use was frequently mentioned as an economically beneficial activity. Mineral development was depicted as being essential to the local economy and any restrictions to mineral uses would have significant economic repercussions. Many of these comments requested that the impacts of any management decisions be examined in terms of potential changes caused to cities and towns.

Some comments indicated that there were also costs associated with resource uses that were not being accounted for. Among the costs mentioned were the

costs of environmental remediation for mineral development sites, the cost of management for OHV use, and the cost of range management for livestock grazing. Comments stated that these costs need to be quantified and included in decision-making processes. Several comments described the concept of total economic value (TEV) and how a complete economic analysis would include all components of TEV including non-market values.

### **Forestry**

There were a few comments that identified forestry related issues that need to be examined in the RMP process. The specific forestry related issues were fire management, the need for forest management plans, forest inventory needs, and a desire to see commercial timber harvesting in the resource area. Those comments that mentioned fire management indicated that forested and non-forested areas lacked natural fire regimes and that controlled burns should be examined as a management tool. Several comments indicated the need for a more complete forest management strategy. These comments pointed out the mandate for sustained yield, a need for cooperation between forest landholders, and brought up the possibility of commercial timber harvests in the resource area. Forest management was also described as potentially beneficial to watershed, wildlife, and livestock management.

### **Livestock/Grazing**

Range management and issues associated with livestock and grazing management were frequently submitted comments. Comments of this type generally fell into one of several categories including, grazing rights, ecosystem integrity, invasive species, wild horses, and the importance of grazing to the local economy and lifestyle. While the comments received fell along a spectrum of potential range management strategies, there were clearly two predominant points of view: those who wished to limit livestock grazing and those who wished to maintain it.

Grazing rights were discussed in a large number of comments and were identified as connected to a wide spectrum of other resource issues. A number of comments brought up the argument that grazing rights are property rights and should be treated as such. These groups and individuals expressed the idea that restricting grazing would be similar to a taking of private property. Many of these comments suggested that this was an inappropriate and perhaps illegal management strategy. Many of these same comments also expressed displeasure with the practice of grazing rights being purchased by conservation groups and then retired. This was identified as an unacceptable practice and one that fails to make use of the resources available.



Accompanying the arguments for grazing rights as property were a significant number of comments that questioned the economics of grazing permits and the level of subsidy being provided by the BLM to grazing permittees. Some of these comments questioned the price of an AUM as well as the number of AUM's permitted in certain areas. There were numerous letters with concerns about the methods used to determine livestock stocking rates. These comments specifically requested a refined scientific approach to determining allowable stocking rates.

A large percentage of the comments identified the issue of ecosystem health as related to grazing as a necessary part of RMP analysis. Nearly all of the comments expressed a desire to maintain and improve range health, but the opinions on how to achieve this varied widely. Many comments identified a need for increased vegetation quantity and quality. Some comments stated that this could be accomplished without reducing grazing, while others felt the only way to achieve this goal was through less grazing.

A large number of comments requested that grazing be restricted or eliminated from riparian and other sensitive resource areas. Reasons for this request indicated that ecosystem function was being severely impacted by the presence of grazing in these areas. Conversely, there were some comments that indicated that grazing was not having negative impacts on riparian systems and that if properly managed it could be beneficial to these areas. Some comments were of the opinion that livestock grazing could help reduce invasive species and decrease soil loss in riparian areas. A few comments requested that the RMP use the best data and science available to determine the actual impacts of grazing in riparian areas and then apply strict standards to maintain and improve the ecosystem function of the riparian zones. Some comments also identified seasonal grazing restrictions as a potentially useful range management tool.

Another aspect of rangeland ecosystem health that was frequently mentioned in the comments was the management of exotic/invasive plant species. A large number of comments requested that the RMP take steps to stop the spread of exotic species and restore native vegetation. Many of these comments also identified the need for more thorough inventories of invasive plants. A number of comments were concerned that invasive species management has focused on mitigation rather than prevention and requested that areas particularly sensitive to invasion be closed to high-risk uses. These individuals and groups also felt that an analysis of the spread of invasive species should include an analysis of vectors that transport seed. Some comments identified the need for careful analysis of the costs and benefits of using non-native plants as range prescriptions. Many of these comments felt the risks of species introduction may often outweigh any benefits such a prescription might provide.

Some comments identified the importance of public lands grazing to local communities as a way of life. These comments cited the belief that livestock grazing can be a sustainable use of the land and a way of sustaining local economies. Many of these individuals felt that it was very important that public lands grazing be recognized as an historically important use of lands and that this use be allowed to continue. There were comments that differed from this point of view in terms of the sustainability of public lands grazing, but no comments downplayed the historical importance of grazing.

Among the other range management issues identified by scoping comments were wild horse and burro herds, artificial water developments, and range treatments such as chaining. Some comments were concerned about horse and burro herd numbers as they related to overall grazing and available forage. These comments discussed the possibility of reducing herd numbers to lessen their impacts and ease the competition for forage among livestock, wildlife and wild horse and burro herds. Many comments identified artificial water developments as a management action they felt was harming the resource. These comments requested that the RMP examine the possibility of prohibiting the development of artificial water sources for livestock grazing. Some comments differed from this point of view and felt that water developments could be effective range management tool when used correctly. Finally, there were comments that expressed concern over range treatments that conflicted with overall range health. Chaining was specifically identified as a range treatment that needed further analysis. Comments also requested that the use of fire for range treatment be closely examined.

### **Oil, Gas, and Mining**

Items related to mineral exploration, leasing, and development were frequently mentioned topics in all of the comments received. Comments identified a full range of issues both in support of and against oil, gas, and mining development. The majority of the mineral development comments discussed administrative, property rights, economic, access, or ecosystem health issues. Each of these categories was thoroughly discussed as relates to oil, gas, and mining.

Many of the comments discussed frustration with the administration of the minerals permitting process. The comments suggested that the efficiency of permits be improved to reduce development costs. Other comments suggested that a full environmental impact statement (EIS) for every permit application was an unnecessary process, and that an environmental assessment (EA) would be sufficient. There were also many comments that identified the fact that future technology may make parts of the resource area more desirable for development.

Similarly, there were several comments that pointed out the need for a better delineation of oil and gas potential in order to predict future exploration and development. These comments requested that this be included in a more accurate assessment of reasonably foreseeable development. Some comments also explained the need for more reasonable reclamation and mitigation standards for all mineral developments. There were also some comments that identified a need to retain the possibility for development in large parts of the resource area in order to anticipate future needs.

Along with the letters and comments that discussed rights and development potential there were many comments that discussed the economics of mineral development. Several comments identified the need to examine the costs that restriction can add to mineral development in the new RMP. These and other comments identified the fact that additional restrictions can have serious repercussions to the efficiency of oil and gas production. The idea of demand driven restrictions and closures was mentioned in order to meet the needs of the public, but also protect area resources. The importance of mineral development to local economies was mentioned frequently. Many comments requested that the impacts of any potential management decisions be carefully analyzed in the RMP. There were also many comments that discussed the national importance of mineral development and the need to allow oil and gas production to ease our dependence on foreign resources.

The most frequently discussed topic related to mineral exploration and development was access. Many comments identified the need to allow roads in the resource area for oil and gas exploration and development. Some of these comments stated that oil and gas access roads could be compatible with ecosystem management if tools such as seasonal restrictions and design criteria were carefully applied. There were also several comments that discussed the need for improved right of way corridor (ROW) permitting for pipelines and similar infrastructure. Lastly, there were comments that explained the need for attention to other mineral resources such as sand and gravel, gypsum, and the potential for resources such as coal and uranium.

Many of the comments received expressed concerns opposite to the need for increased mineral development. The need for improved administration of mineral development was also highlighted in these comments. Many comments specifically requested the broad use of the No Surface Occupancy (NSO) designation for WSA's, ACEC's, and other special management areas. There were also comments that requested that the RMP examine seismic exploration for mineral resources and potentially restrict its use in special management or sensitive resource areas. Concern over the visual impacts of oil and gas development was a primary theme in many of the comments. There were many

comments that suggested a need for improved administration of previously developed sites to improve safety, ecosystem health, and visual appearance.

Connected to the administrative comments on these issues were comments targeting the need to improve mitigation, reclamation, and restoration standards for mineral development. These comments identified a need to strengthen protective standards for the land and its resources. They also requested that there be a more balanced approach to land use in the resource area. The historical impacts of mineral development were cited as justification for a close analysis of development restrictions in the new RMP. Impacts to wildlife were also noted as a serious consequence of minerals exploration and development that needed to be included in the RMP analysis.

Economics were also mentioned as a factor for considering restrictions on oil and gas development. Comments requested that cost/benefit analyses include the full costs of the impacts caused by mineral development. These comments also cited the potential benefits of alternative uses to oil and gas development as an important factor for the RMP to consider. Some comments identified the future need for mineral resources as a possible reason to restrict current resource development. There were also some comments that identified alternative energy sources as an issue for the RMP to examine. Environmental justices as related to short term planning horizons was also mentioned as an issue for further analysis.

Many comments identified access for oil and gas development as a significant problem in the resource area. Some of these comments requested that no oil and gas leasing be allowed in the resource area, while others suggested that NSO be a standard stipulation for all leases in the area. Many of these comments requested that the suitability of mineral development be examined across the resource area and strictly limited to areas where it was most appropriate. There were also comments identifying the need to withdraw sensitive resource areas in order to protect them from the impacts of development.

### **Recreation/OHV**

Recreation received more comments than any other use. Many different types of recreation activities were identified as important to individuals and organizations. Access for these uses was a major theme in many of the comments. OHV use was the subject of many comments as well, with a large number of associated issues mentioned. Other comments discussed the compatibility of recreation with other resource uses as well as social and ecosystem conditions.

A wide variety of recreational uses were mentioned in the comments. Each of these uses had an issue or issues to be considered in the RMP analysis. Some

comments dealt with the need for more and improved single-track trail opportunities. Comments identified a lack of single use trails for motorcycles and mountain bikes. Similarly, a number of comments indicated that the RMP needed to consider ways to make group recreation permits easier to obtain. Some comments also expressed a desire for family motorized recreation areas where younger riders could learn to ride without experiencing user conflicts.

One comment that was frequently expressed was the desirability of primitive and dispersed camping experiences. Many comments stated that they wanted the new RMP to establish ways to maintain dispersed camping in as many areas as possible. Desire for dispersed camping was connected to nearly every recreational activity and was a consistent theme across all types of users. There were also some comments that expressed desire for a limited amount of developed camping areas with some primitive facilities. Individuals felt that these would be good sites for large groups, families, and a good management tool to reduce the impacts of camping in some areas. Some individuals thought that developed campsites could be built with facilities for OHV use such as unloading ramps, hardened parking areas, restroom facilities, and trail information in a centralized location.

A number of comments addressed the use of horses and other pack animals in the resource area. These groups and individuals would like to see the RMP maintain all of the existing opportunities for horseback recreation. Other comments highlighted river recreation as an issue that needed to be addressed in the RMP. Some comments pointed out a need for additional private boater permits on some river sections. River comments focused on maintaining a primitive recreation experience that minimized impacts to the resource. Several comments were received regarding recreational use of backcountry airstrips. In addition to airstrips as an access issue, these groups and individuals believe that airstrips should be analyzed as a component of recreation planning in the RMP. Nearly all of these comments felt that recreational use of backcountry airstrips was compatible with almost all other resource uses and had little impact on the ecosystem.

One of the persistent themes in all comments regarding recreation in the planning area was the need for vehicle access for recreation users. Comments described vehicles as more than recreational equipment, but as a means of access for other activities and requested that the RMP take this into consideration. Another frequently mentioned category of recreation experience was wilderness and primitive recreation experiences. Many of the comments wanted the RMP to consider the impacts that all other uses could have on wilderness recreation. There was clear interest in maintaining and improving opportunities to access wilderness sites and other primitive areas. Many of these comments stated that

motorized and wilderness opportunities could coexist if they were planned for in the RMP.

Another category of comments went beyond activity level concerns and addressed a general need for improved recreation management by the BLM. Some of the topics mentioned in this category were improved education, expanded law enforcement, better signage, and more innovative on-the-ground management. Improved user education was frequently requested in all types of comment. Individuals, organizations, and other governments all stated that increased user education should be a key component of the RMP. Universally, the comments felt that education would solve many resource degradation and user conflict problems.

Connected with many of the requests for user education were a number of comments that identified a lack of law enforcement as one of the reasons for resource degradation and user conflict. These comments identified a need for an expanded law enforcement program and gave several enforcement related suggestions. A large number of comments suggested a peer enforcement program using OHV groups and other volunteers to educate users and enforce regulations. These suggestions indicated that this type of program would be a valuable way to establish user group partnerships and increase public participation in BLM decision-making.

In addition to peer enforcement, there were many comments that requested more law enforcement officers throughout the area. Individuals and groups identified a visible law enforcement presence as one of the best deterrents to resource damaging activities. BLM law enforcement was one need mentioned in the comments, but coordination with local law enforcement was also frequently discussed. Comments requested that the RMP consider ways to increase communication and coordination with local law agencies. Many of these individuals felt that local agencies could provide a more thorough and user-friendly enforcement presence.

A need for improved recreation signage was another frequently received type of comment. Users identified the lack of signs on roads and trails as one of the primary causes of resource degradation in the planning area. Numerous requests were made for the RMP to design and implement a comprehensive and consistent system of signage for all roads, trails, and other recreation sites. Such a system should tie in to trail designations and trail loops. Signage could also incorporate user education in the form of trailhead kiosks and interpretive signs in appropriate locations. Suggestions also stated that trail signs and designations include what types of vehicle were permitted and/or restricted in certain areas in order to improve resource use and decrease user conflict. In addition to signage and designations for roads and trails, some comments identified a need for a

quality recreation map of the planning area. These comments felt that a quality map in conjunction with enforcement, designations, and signage would minimize future resource damage.

Route designation was one of the items addressed both in comments related to access as well as those related to recreation. While access type comments indicated a need for general route designation, recreation comments expressed a need for specific route and area designations. Many of these letters and comments described classification systems by trail or for certain areas that would indicate the type of allowable use. Comments requested that the RMP consider concepts similar to recreation zoning and/or single use trails. Reasons for these requests were incompatibility of certain recreation uses, degradation to the resource caused by unclear regulations, and a desire for various types of recreation experience only available when other uses were taking place in other areas or at other times.

The other primary type of comment received in regard to recreation dealt with the compatibility of recreation with other resource uses. Many comments stated that recreation could be managed in such a way as to be compatible with almost every other resource use including the needs of wildlife, mineral development, special designations, cultural resources, and grazing. A number of these comments wanted the new RMP to plan for increased recreation. Suggestions on accomplishing this included seasonal restrictions to activities, strategic route designations, and improved planning coordination.

### **Wilderness/Special Designations**

Comments received regarding wilderness and other types of special designations were the most frequent type of comment. Unlike most of the other types of comments, wilderness comments were either for the use of special designations or against them. Many comments indicated support for existing WSA's and ACEC's and requested that the RMP consider additional designations. Conversely, many other comments stated that WSA's and other restrictive designations had been overused in the past and should not be included in the new RMP. Some of the topics included in these comments included WSA's, Wild and Scenic River designations, ACEC's, wilderness proposals, and the uses allowed in these designated areas.

WSA's were the primary point of discussion in the designation type comments. Many of these comments indicated that WSA's were one of the most effective ways to protect the ecosystem and asked that the existing WSA's be maintained and additional WSA's be designated. These commentors felt that the ability to limit certain activities in these areas was one of the primary benefits of their use. Comments specifically mentioned cherry stemmed roads, oil and gas

development, OHV use, and livestock grazing as some of the resource uses incompatible with wilderness quality areas. They asked that these resource uses be restricted in all existing and future WSA's.

Many comments expressed opinions opposite to those that supported WSA's. These comments identified WSA designation as an undue restriction to many activities. Many of these comments pointed out that existing and potential WSA's included points of interest and recreation sites that they liked to visit via motor vehicle. Use of the WSA designation precluded easy access to these areas and kept some individuals from having their desired recreation experience. Comments requested that the RMP not allow additional designations to cut off access to such areas and that existing WSA's be examined for ways to allow increased access for recreation. Maintaining access where it has been historically maintained was one of the primary themes of this type of comment. Local involvement on WSA designations was requested in many of the comments.

In many cases comments indicated a desire for the RMP to consider additional areas for WSA designation. Specifically, the comments mentioned parts of the planning area described by the Citizen's Wilderness Proposal and the proposed America's Redrock Wilderness Act. Comments requested a re-inventory of these areas for their wilderness potential and that they be managed like wilderness areas until such an inventory and designation has taken place. Suggestion on how the RMP could accomplish this included No Surface Occupancy (NSO) stipulations, mineral withdrawals, OHV use restrictions and grazing exclusions.

Many comments also ran counter to this suggestion and stated that there should be no additional WSA's. The comments asked that serious consideration be given to the management of WSA's that lacked wilderness characteristics and whether or not additional activities could be allowed there without impacting their current condition. A large number of the comments indicated that the current condition of some WSA's was incompatible with any type of wilderness designation and that the RMP should address how to manage these areas in a way more suited to their condition. Many indicated that additional roads, mineral development, grazing, and recreation use would be some of the best uses for parts of the existing and proposed WSA's. Some comments requested that the RMP consider another level of resource management that would limit some types of access, but not be as restrictive as wilderness designation. These comments described a level of management similar to a Semi-Primitive Motorized classification on the Recreation Opportunity Spectrum where the impacts caused by some uses were only temporary and often reduced by natural processes.

Counter to these ideas were the expressed opinion that activity in WSA's should be limited to non-motorized recreation. Individuals and organizations stated



that wilderness areas should not allow activities such as mineral development, grazing, or motorized access. WSA's were described as a place for a primitive recreation experience away from other types of resource use. Activities mentioned in comments as suitable for the WSA's were hiking, horseback riding, and mountain climbing.

Wild and Scenic Rivers were mentioned in the comments received. Many comments expressed a desire for the RMP to consider river segments within the planning area for eligibility and suitability for designation. Several individuals felt that there were both segments and entire river corridors worthy of this designation. Some comments indicated that any restrictions to access that might be caused by Wild and Scenic designations should be carefully considered in the RMP. Other comments indicated that Wild and Scenic designation should not be used for rivers in the planning area.

A number of comments were received on other special designation comments such as Visual Resource Management (VRM), Areas of Critical Concern (ACEC), and fee demonstration areas. Some comments requested that the RMP evaluate the effectiveness of devising recreation zones based on recreation opportunity spectrum. These comments described compartmentalization of recreation uses in order to reduce user conflict and improve recreation experiences. Other comments discussed ACEC's and their effectiveness at protecting sensitive resources. Some of these comments identified specific areas for ACEC designation such as Sids Mountain, Factory Butte, and others. There were some comments that disagreed with the use of VRM and ACEC's as management tools because they created too many restrictions on uses in the special management areas. Finally, a few comments requested that fee areas not be considered in the new RMP.

### **Wildlife/Hunting**

Comments on wildlife habitat management and other issues associated with animal species in the planning area were received from many individuals and organizations as well as some government agencies. A wide range of issues were addressed in these comments including:

- Winter range management
- Threatened and endangered species
- Native Fish Species
- Watchable Wildlife
- Hunting Opportunities
- Wildlife/Livestock Conflicts
- Water Developments
- Non-native species introduction
- Range treatments
- Interagency Consultations

Most comments supported the presence of wildlife in the planning area, but suggested different approaches for the BLM to provide suitable habitat and opportunities. Some comments focused on maintaining big game species while others emphasized native species management. A number of comments suggested ways that the BLM could improve wildlife administration with different management actions, better science, and improved communication.

One of the issues addressed was the need to minimize conflict between wildlife and other resources. Many comments identified recreation, mineral development, and grazing as uses that have potential wildlife conflicts. These comments suggested that the RMP identify ways to limit these impacts through closures or restrictions. The letters requested that the best available data and science be used to determine the nature and extent of wildlife conflict before management decisions are made.

Other commenta addressed the need to manage for and protect native species. Many individuals requested that all special status species in the planning area be given significant management attention in the RMP. Some comments focused on limiting the amount of management attention paid to non-native species' habitat management as well as avoiding the introduction of new non-native species. Comments specifically mentioned a need for management attention towards threatened and endangered (T&E) species and native fish species.

Many comments addressed BLM administrative and management actions that impact wildlife habitat and wildlife management by other agencies. Many specific comments requested that the RMP eliminate range treatments and guzzler type water developments. There were also a small number of comments in favor of these practices. Comments stated that consultation with the wildlife agencies needed to occur early and needed to produce comprehensive habitat management plans for all species. Other comments requested that the RMP provide a process to allow non grazing rights transfers to wildlife through non governmental organizations.

Specific ideas on wildlife-related recreation included developing or expanding watchable wildlife opportunities. Comments also mentioned a desire for continued hunting access to the planning area with improved coordination between agencies. There was also specific mention of Big Horn sheep as an under managed species.

## **Other**

Comments that were categorized as “other” did not have a single theme that was easily identifiable or in some cases covered many different topics. A summary of all of the comments within this category would be impractical, however a sample of some of the topics are listed below.

- Need for resource monitoring
- Protect all resources
- Support for ecosystem management
- Evaluate all types of impact
- Simplify RMP document
- Need to use all sources of data
- Support for multiple use
- Use weighted decision analysis
- Don’t use comments as votes
- Review the RMP for consistency

There were many other comments categorized as other and all are listed in the comment summary sections.

## **6.0 ISSUES BEYOND THE SCOPE OF THE RMP/EIS**

### **6.1 RS 2477**

One frequently mentioned item in discussion of access was the RS 2477 issue. Individuals felt that the BLM has not adequately addressed this issue despite the ongoing litigation. Many comments identified a desire to see the access and roads issues related to RS 2477 litigation resolved. A large number of the comments received clearly stated that a preference to have all historical access routes recognized and continued use of these ways permitted. Most of these comments were directed towards resolving the legal complications of the RS 2477 issue, but discussed ways to manage the transportation system in a manner consistent with the intent of that legislation. Many commentors felt that a balanced system of road management could be achieved without final legal decision.

BLM is unable to influence the speed or outcome of any future legal decisions. BLM must manage roads, trails, and ways according to existing policies and guidelines. BLM understands the amount of time that this issue has remained unresolved and appreciates the comments received on this topic. BLM will make every effort to produce a workable transportation plan in conjunction with the RMP. It cannot, however, recognize pre RS 2477 ways as that would be outside of existing policies and guidelines.

## 6.2 Wilderness Designation

Although the BLM has the ability to inventory areas for wilderness potential and manages WSA's, it does not have the regulatory power to formally declare wilderness areas. Congress has the ability to declare WSA's as formal wilderness or determine that WSA's should no longer be considered for wilderness designation. A large number of comments were received asking that the wilderness designation process be completed. BLM understands the desire to have wilderness designation issues resolved, but cannot go beyond existing policy. BLM encourages comments regarding wilderness designation be communicated to congressional representatives.

## 6.3 Wild and Scenic River *Designation*

The Wild and Scenic River designation is a complex three-step process. The BLM is charged with two of these steps, eligibility and suitability determination. BLM does not have the authority to designate Wild and Scenic Rivers; it is a Congressional authority. BLM will be conducting an extensive process to determine those river segments that are eligible and suitable for consideration as Wild and Scenic. Following that process, designation can only be finalized by Congress.

## 6.4 Potential San Rafael National Monument Designation

A number of comments received in this planning process discussed the potential San Rafael National Monument being proposed by the Emery County Commissioners. This RMP planning process does not include the San Rafael National Monument proposal. Concerns relating to this proposal should be addressed to Emery County.